



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

File Copy

September 30, 2013

Mr. Mark Zimmermann
Updike, Kelly & Spellacy, P.C.
One State Street
P.O. Box 231277
Hartford, CT 06123-1277

Re: Former Howe Furniture Corporation, 151 Woodward Avenue, Norwalk, CT,
EPA ID No. CTD001162858
Remedy Selection (CA400) and Construction Complete (CA 550).

Dear Mr. Zimmermann,

The former Howe Furniture Corporation facility (Howe) located at 151 Woodward Avenue, Norwalk, CT, has achieved the "Remedy Selection" (CA 400) and "Construction Complete" (CA 550) Corrective Action Milestones. The Facility is subject to the Resource Conservation and Recovery Act (RCRA) Corrective Action requirements due to its former operation as a Treatment, Storage, and/or Disposal Facility (TSDF) under interim status for the storage of hazardous wastes for greater than 90 days. Howe Furniture was sold in 1998, which made it also subject to the Connecticut Department of Energy and Environment (CTDEEP) Property Transfer Act Program which is implemented under the Remediation Standard Regulations (RSRs).

In August 2013, EPA prepared the Statement of Basis for a Corrective Action Completion Determination (SoB) for the former Howe facility which proposed that the Facility's Corrective Action obligations are "Complete with Controls". The SoB proposal was opened for a public comment period which lasted forty five days from August 15, 2013 through September 28, 2013. The SoB was public noticed in *The Hour*, a daily newspaper published in Norwalk, CT, on August 15, 2013. No comments were received during the public comment period.

The Howe Folding Furniture Company manufactured wood and metal office and school furniture from 1962 when the building was constructed until 1995. The Site is developed with an L-shaped warehouse building which is accessed by a shared driveway/right-of-way located along the northern property boundary. The Site is located within a mixed commercial, industrial and residential area, and is located within the 100 year flood plain of Village Creek, a wetland which abuts the Site to the west. Norwalk harbor is located approximately 0.25 miles to the east/northeast of the Site.

Howe operations included machining, welding, painting, vapor degreasing, and soldering. Hazardous wastes generated at the facility included degreasing solvents, waste lacquers,

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 POST OFFICE BOX 110
BOSTON, MA 02111-0110
TELEPHONE 617/351-2000
FAX 617/351-2001
WWW.EPA.REGION1.GOV

paints, and thinners which were stored in drums at several locations. Contaminants of concern at the Site include chlorinated solvents, metals, and fuel oil constituents. Following the cessation of Howe operations, the building was subdivided and leased to several tenants including Cober Electronics, Pepperidge Farms, and the U.S. Postal Service.

The Howe Site has been iteratively investigated since the early 1990's, including the performance of numerous interior and exterior soil borings, collection and analysis of soil samples, a soil gas survey, and installation and sampling and analysis of approximately 25 groundwater monitoring wells located across the 7 acre property. Groundwater quality has been periodically monitored including sampling events in August 1995, February and March 1999, August and December 2002, March and August 2006, quarterly in 2007, and September 2009. An on-Site groundwater plume of contaminants has never been detected, although there have been spatially and temporally sporadic detections of several contaminants, which have generally exhibited slowly decreasing concentrations over the years.

In 2005, groundwater beneath and in the vicinity of the Site was re-classified from GA to GB under the RSRs. The applicable RSRs for Site soils are the Residential Direct Exposure Criteria (R-DEC), the Industrial/Commercial Direct Exposure Criteria (I/C-DEC), and the Pollutant Mobility Criteria (PMC) for GB classified areas. The applicable RSR criteria for groundwater at the Site are the Surface Water Protection Criteria (SWPC), and the Residential Ground Water Volatilization Criteria (R-GWVC) and Industrial/Commercial Volatilization Criteria (I/C-GWVC), which are protective of volatile contaminants in groundwater off-gassing and migrating into buildings.

In 1988, a 3,000 gallon heating oil Underground Storage Tank (UST) was removed from the Site. Approximately 1200 tons of petroleum contaminated soils were removed from the area in 1995. Remaining soils are below RSR standards.

Metals, including arsenic, lead, cadmium, copper, mercury and zinc have been detected in groundwater at the Site. Arsenic is the only metal that is consistently detected above the SWPC of 4 ppb. Exceedances of the SWPC for arsenic occur in several wells at an average arsenic concentration of approximately 15 parts per billion (ppb). Arsenic is not known to have ever been used at the Site. The detections of arsenic are widely distributed across the Site, are sporadic in occurrence, and do not appear to be associated with source areas. Instead, arsenic appears to be leaching from fill and/or natural marsh sediments underlying the surrounding area. Since there is no net discharge of the groundwater to the adjacent wetlands or nearby Norwalk Harbor, the SWPC are not strictly applicable. Based on the results of a screening level ecological risk assessment, EPA concludes that there is no source or route for contaminant migration to the wetlands, and little to no risk to wetland receptors from the Site.

Vinyl chloride has been detected in several wells on-Site at low ppb concentrations that are slightly above the current RSR standard of 2 ppb, but significantly below the proposed I/C-GWVC standard of 52 ppb. The wells with vinyl chloride impacts are

located within a right-of-way which allows access to the rear parcel. No exposure pathway exists for vapor intrusion because buildings cannot be constructed in the right-of-way. The concentrations of vinyl chloride appear to be dropping slowly over time.

The Corrective Action Completion Determination is "Complete with Controls". Howe is currently working to execute an Environmental Land Use Restriction (ELUR) which will restrict future use of the Site to non-residential use, prohibit disturbance of soils beneath the building, prohibit demolition of the building, and render soils beneath the building slab inaccessible and environmentally isolated.

Based on the investigations conducted at the Site, remaining soil contamination at the Site is limited to lower concentrations of metals and petroleum below applicable RSR criteria, or above criteria but located under the building. Arsenic is pervasive at low levels, but is likely associated with Site fill and/or marshy sediments below the fill. Potential unacceptable exposure risks from the remaining limited and shallow soil contaminants are unlikely because the contamination is under buildings or pavement, exists at relatively low concentrations, and is unlikely to migrate or degrade the environmental quality further. All existing soil contamination can be brought into compliance with the RSRs by an ELUR to render the soils beneath the building inaccessible and environmentally isolated and limit the Site to Industrial/Commercial use.

No public comments were received during the 45 day public comment period.

EPA has determined that the Site has met the Remedy Selection (CA400) and Construction Complete (CA550) milestones.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Brackett", followed by a stylized flourish.

Robert Brackett
RCRA Facility Manager

Cc: Daniel Wainberg, EPA
Peter Hill, CTDEEP

